

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

CASE NAME: McKenzie v. Brannan, et al.

DOCKET NO: 2:20-cv-00262-NT

**Joint Exhibit List**

Court Exhib	Description	Obj	Date Mentioned	Date Offered	Date Admitted
1.	Agreement with Art Editions, 8/11/2008, with Addendums (the "HOPE" Agreement")		7/20/22	7/20/22	7/20/22
2.	Confidential and Binding Term Sheet, 11/26/2019		7/20/22	7/20/22	7/20/22
3.	Cease & Desist Letter from Brannan to McKenzie, 5/9/2019		7/20/22	7/20/22	7/20/22
4.	McKenzie AAA Pleading, 8/22/2019		7/20/22	7/20/22	7/20/22
5.	McKenzie Mediation Statement, 11/18/2019		7/20/22	7/20/22	7/20/22
6.	Mediation Sign in Sheet, 11/25/2019		7/20/22	7/20/22	7/20/22
7.	E-mail, 11/25/2019, M. McKenzie, P. Coughlan		7/20/22	7/20/22	7/20/22
8.	E-mail, 11/26/2019, M. McKenzie, All Parties		7/20/22	7/20/22	7/20/22
9.	E-mail, 11/26/2019, M. McKenzie, S. Brewster		7/20/22	7/20/22	7/20/22
10.	E-mail, 11/26/2019, S. Shultz, E. Boyle (with attachment)		7/20/22	7/20/22	7/20/22
11.	E-mail, 11/26/2019, S. Shultz, J. Simoni (with attachment)		7/20/22	7/20/22	7/20/22
12.	E-mail, 11/26/2019, J. Simoni, S. Shultz		7/20/22	7/20/22	7/20/22
13.	E-mail, 12/12/2019, M. McKenzie, Multiple Parties (with attachment)		7/20/22	7/20/22	7/20/22
14.	E-mail, 11/27/2019, J. Simoni, E. Boyle to AAA		7/20/22	7/20/22	7/20/22
15.	E-mail, 11/29/2019, M. McKenzie, Multiple Parties		7/20/22	7/20/22	7/20/22
16.	E-mail, 12/05/2019, M. McKenzie, Third-Parties (with attachment)		7/20/22	7/20/22	7/20/22
17.	E-mail, 12/06/2019, P. Coughlan, M. McKenzie		7/20/22	7/20/22	7/20/22
18.	E-mail, 12/09/2019, M. McKenzie, J. Simoni & E. Boyle		7/20/22	7/20/22	7/20/22

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Court Exhib	Description	Obj	Date Mentioned	Date Offered	Date Admitted
19.	E-mail, 12/09/2019, E. Boyle, J. Simoni		7/20/22	7/20/22	7/20/22
20.	E-mail, 12/09/2019, M. McKenzie, Third-Parties		7/20/22	7/20/22	7/20/22
21.	E-mail, 12/09/2019, M. McKenzie, S. Brewster		7/20/22	7/20/22	7/20/22
22.	E-mail, 12/12/2019, M. McKenzie, J. Simoni		7/20/22	7/20/22	7/20/22
23.	E-mail, 12/12/2019, J. Simoni, E. Boyle		7/20/22	7/20/22	7/20/22
24.	E-mail, 12/13/2019, M. McKenzie, P. Coughlan		7/20/22	7/20/22	7/20/22
25.	E-mail, 12/16/2019, E. Boyle, J. Simoni (with attachment)		7/20/22	7/20/22	7/20/22
26.	E-mail, 12/17/2019, E. Boyle, J. Simoni (with attachment)		7/20/22	7/20/22	7/20/22
27.	E-mail, 12/17/2019, M. McKenzie, J. Simoni		7/20/22	7/20/22	7/20/22
28.	E-mail, 12/17/2019, M. McKenzie, P. Coughlan, S. Brewster, L. Conti		7/20/22	7/20/22	7/20/22
29.	E-mail, 12/18/2019, M. McKenzie, P. Coughlan, S. Brewster, L. Conti, J. Simoni		7/20/22	7/20/22	7/20/22
30.	E-mail, 12/20/2019, M. McKenzie, E. Boyle		7/20/22	7/20/22	7/20/22
31.	E-mail, 12/30/2019, M. McKenzie, E. Boyle & J. Simoni		7/20/22	7/20/22	7/20/22
32.	E-mail, 12/30/2019, M. McKenzie, S. Brewster		7/20/22	7/20/22	7/20/22
33.	E-mail, 01/02/2020, A. Vessecchia, M. McKenzie (with attachment)		7/20/22	7/20/22	7/20/22
34.	E-mail, 01/03/2020, M. McKenzie, P. Coughlan, S. Brewster, L. Conti, J. Simoni, Frumer, Gonzalez		7/20/22	7/20/22	7/20/22
35.	E-mail, 01/07/2020, K. Lipson, N. Putnam, J. Simoni, E. Boyle, S. Brewster		7/20/22	7/20/22	7/20/22
36.	E-mail, 01/08/2020, M. McKenzie, L. Conti & C. Moylan		7/20/22	7/20/22	7/20/22
37.	E-mail, 01/09/2020, M. McKenzie, L. Conti & C. Moylan		7/20/22	7/20/22	7/20/22
38.	E-mail, 01/10/2020, M. McKenzie, L. Sterrs		7/20/22	7/20/22	7/20/22
39.	E-mail, 01/10/2020, M. McKenzie, L. Sterrs, Putnam, Moylan, Brewster		7/20/22	7/20/22	7/20/22
40.	E-mail, 01/15/2020, M. McKenzie, Putnam, Brewster, Gonzalez, Conti		7/20/22	7/20/22	7/20/22
41.	E-mail, 01/15/2020, E. Boyle, J. Simoni, K. Lipson, N. Putnam		7/20/22	7/20/22	7/20/22

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42.	E-mail, 01/16/2020, M. McKenzie, Undisclosed		7/20/22	7/20/22	7/20/22
43.	E-mail, 01/17/2020, M. McKenzie, Putnam, S. Brewster, L. Sterrs, J. Simoni, Gonzalez		7/20/22	7/20/22	7/20/22
44.	E-mail, 01/17/2020, J. Simoni, E. Boyle		7/20/22	7/20/22	7/20/22
45.	Letter, 01/21/2020, J. Simoni, E. Boyle		7/20/22	7/20/22	7/20/22
46.	E-mail, 01/22/2020, E. Boyle, C. Moylan		7/20/22	7/20/22	7/20/22
47.	E-mail, 01/23/2020, M. McKenzie, C. Moylan, J. Simoni, Boyle		7/20/22	7/20/22	7/20/22
48.	E-mail, 01/24/2020, J. Simoni, S. Brewster		7/20/22	7/20/22	7/20/22
49.	E-mail, 01/27/2020, M. McKenzie, M. McLaughlin (attachment letter)		7/20/22	7/20/22	7/20/22
50.	E-mail, 01/27/2020, M. McLaughlin, E. Boyle		7/20/22	7/20/22	7/20/22
51.	Letter, 01/28/2020, J. Simoni, E. Boyle		7/20/22	7/20/22	7/20/22
52.	Letter, 02/03/2020, E. Boyle, J. Simoni		7/20/22	7/20/22	7/20/22
53.	E-mail, 02/07/2020, M. McKenzie, S. Brewster		7/20/22	7/20/22	7/20/22
54.	E-mail, 02/12/2020, J. Simoni, M. McKenzie, Gonzalez		7/20/22	7/20/22	7/20/22
55.	E-mail, 2/14/2020, J. Simoni, E. Boyle (with attachment)		7/20/22	7/20/22	7/20/22
56.	E-mail, 02/14/2020, J. Simoni, E. Boyle		7/20/22	7/20/22	7/20/22
57.	Verified Complaint, 7/26/2020		7/20/22	7/20/22	7/20/22
58.	Letter, 4/23/2020, J. Simoni, J. Torres		7/20/22	7/20/22	7/20/22
59.	Proposed Verified Fourth Amended Answer, 4/27/2020		7/20/22	7/20/22	7/20/22
60.	Letter, 5/04/2020, E. Boyle, J. Moses		7/20/22	7/20/22	7/20/22
61.	Letter, 5/07/2020, J. Simoni, J. Moses		7/20/22	7/20/22	7/20/22
62.	E-mail, 06/12/2020, M. McKenzie, K. Lipson		7/20/22	7/20/22	7/20/22
63.	E-mail, 06/30/2020, M. McKenzie, P. Coughlan		7/20/22	7/20/22	7/20/22
64.	E-mail, 7/03/2020, M. McKenzie, Mattiaccio, Boyle, Vazquez, Beeber		7/20/22	7/20/22	7/20/22

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UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

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DOCKET NO: 2:20-cv-00262-NT

**Joint Disputed Exhibit List - Objections**

Court Exhib	Description	Obj	Date Mentioned	Date Offered	Date Admitted
100.	Resume of Michael McKenzie				
101.	AIA Accounting of Payments to Indiana				
102.	Email, 12/20/2019, L. Sterrs, E. Boyle, Other Counsel for Estate and SOH	X	7/20/22	7/20/22	7/21/22
103.	Email, 1/15/2020, E. Boyle, N. Putnam, L. Sterrs, Other Counsel for Estate and SOH	X	7/20/22	7/20/22	7/21/22
104.	Estate Second Amended Counterclaim v Morgan (SDNY), 3/2/2020				
105.	Photographs of Robert Indiana signing McKenzie/AIA published artwork				
106.	Videos of Robert Indiana signing McKenzie/AIA published artwork				
107.	Power of Attorney, Indiana appointing Jamie Thomas, 5/7/2016				
108.	Email, 7/20/2017, J. Frumer to S. Salama-Caro				
109.	Letter to Morgan Art Foundation, Salama-Caros from J. Frumer, 2/28/2018				
110.	Letter to Christie's from J. Frumer, 3/2/2018				
111.	Letter to Phillips from J. Frumer, 3/2/2018				
112.	Letter to Sotheby's from J. Frumer, 3/2/2018				
113.	Letter to Cyber City Inc. from J. Frumer, 3/9/2018				
114.	Joint Stipulation of Facts in AAA	X	7/20/22	7/20/22	7/20/22

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<b>115.</b>	Declaration of O.Gonzalez, 08/31/2021				
<b>116.</b>	AAA Interim Award with Injunction, 09/14/2021, AAA Panel, Parties	X	7/21/22	7/21/22	
<b>117.</b>	Stipulation and Consent Order Confirming Interim Award and Entering Injunction 10/18/2021, SDNY Judge Torres				
<b>118.</b>	AAA Order No. 11	X	7/20/22	7/20/22	X
<b>119.</b>	Order re Injunction in NY	X	7/20/22	7/20/22	7/20/22